

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Hawaii

United States of America)

v.)

Brandon Charles Saffuels)

Mag. No.

21-1414 KJM

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

Dec 06, 2021, 4:47 pm

Michelle Rynne, Clerk of Court

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 3 to December 5, 2021 in the county of Maui in the
District of Hawaii, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2422(b)

Attempted Enticement of a Minor

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Matthew Laramee, HSI Special Agent

Printed name and title

Sworn to under oath before me telephonically,
and attestation acknowledged pursuant to
Federal Rule of Criminal Procedure 4.1(b)(2)Date: December 6, 2021 at 4:46 p.m.City and state: Honolulu, HawaiiKenneth J. Mansfield
United States Magistrate Judge

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

INTRODUCTION

1. This affidavit is submitted for the purpose of establishing probable cause that BRANDON CHARLES SAFFEELS, the defendant, on or about December 4, 2021, violated 18 U.S. Code § 2422(b), and attempted to do so, within the District of Hawaii, when he knowingly enticed a minor to engage in sexual activity in or affecting interstate and foreign commerce by any means, including by computer.

2. I am a Special Agent with Homeland Security Investigations (HSI) and am presently assigned to the Honolulu Field Office, Cyber Group. I have been employed as a Special Agent with HSI since May 2020. I have investigated criminal cases including internet crimes against children, drug smuggling, human trafficking, fraud, and other violations. As part of these investigations, I have participated in the service of federal search warrants and criminal arrests. I have received training in criminal investigations involving enticement of minors, including training provided by the Internet Crimes Against Children (ICAC) taskforce for the investigation of individuals attempting to entice minors. I have participated in training courses for the investigation and enforcement of federal enticement laws in which cell phones and computers are used as the means to access a minor. I have been involved in investigations involving online solicitation/enticement of minors.

1 3. I am familiar with the facts set forth in this affidavit based upon my
2 personal knowledge and information provided to me by other law enforcement personal
3 and/or witnesses. This affidavit is intended to show merely that there is sufficient
4 probable cause for the criminal complaint charging BRANDON CHARLES
5 SAFFEELS with violations of federal law. Accordingly, this affidavit does not set forth
6 all the facts known to me or to law enforcement regarding this matter. Summaries of
7 evidence and statements from conversations do not necessarily include all topics
8 covered in the matter observed or known to the government.
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11 **PROBABLE CAUSE**
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13 4. On December 3, 2021, Homeland Security Investigations (HSI) Honolulu
14 field office, was conducting an undercover operation with the Maui Police Department,
15 with assistance from the Federal Bureau of Investigation (FBI) and the United States
16 Secret Service (USSS). The goal of this operation was to identify, locate, and apprehend
17 individuals located on the Isle of Maui who were attempting to solicitate/entice minors
18 for sexual activity by means of electronic devices connected to the internet.
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21 5. On December 3, 2021, at approximately 10:30AM, an undercover chatter
22 was contacted by a suspect utilizing the phone number (808) 283-9024. HSI analysts
23 working on the operation were able to identify BRANDON CHARLES SAFFEELS as
24 the registered owner of the phone number. Over the course of thirty-eight hours the
25 suspect and the undercover chatter continued to message each other. These exchanges
26 included the following messages, and not all messages are included:
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1 Chatter: Upfront tho – Im waay younger than wht my profile says. Just put a
2 rando number

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4 ...

5 Suspect: How old are u

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7 Suspect: I know that

8
9 Suspect: Upfront. I want a sexy pic lol

10 Chatter: cool. Plz don't judge but im 13. Just hate stupid kids my age.

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12 Suspect: Send me something.

13
14 Chatter: huh?

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16 Suspect: Sexy atleast if your comfortable

17 Chatter: lol. U okay wit my age? Not lookin to waste time

18 Suspect: Age is just a number. Will see if u send a sexy pic.

19
20 ...

21 Suspect: I have something for u

22 Chatter: Whaaaat is it? (laughing/crying emoji)

23
24 Suspect: Money lmao

25 Suspect: Can I see u for like 30 min

26
27 ...

28 Chatter: How much? (money bag emoji, laughing/crying emoji)

1 Suspect: How much u want lol

2 Suspect: or r u wasting time again

3 Chatter: (confused person emoji, female symbol emoji) What I gotta do?

4 Suspect: Sex

5 Suspect: Duh

6 Suspect: Or what ever

7 Suspect: U not a Virgin right

8 Chatter: Lol. Not up the butt

9 Chatter: No

10 Suspect: I don't want your butt lol

11 Chatter: I gotta try n get away from my cusin guys.. I don't want get n trble

12 Suspect: How u gonna do that

13 Suspect: Take a walk

14 Suspect: 20 min all we need

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21 6. In later conversation, the suspect sent a full body nude photograph
22 partially showing his genitals to the chatter. Maui Police Department Officers
23 familiar with BRANDON CHARLES SAFFEELS viewed the photograph and verified
24 that the subject of the photograph was in fact BRANDON CHARLES SAFFEELS. In
25 another later conversation, the subject stated that he will send money to the chatter in
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1 exchange for a nude photograph of the chatter. Later that night, the subject messaged
2 the chatter expressing his desire to make a pornographic video with the chatter.

3 7. On December 4, 2021, at approximately 10:30PM, the suspect contacted
4 the chatter and requested that they meet for sex. The chatter requested that the suspect
5 meet them at the Piilani Village Shopping Center Safeway located at 277 Pi'ikea Ave,
6 in Kihei, Hawaii. On December 5, 2021, at approximately 00:05AM the suspect, later
7 identified as BRANDON CHARLES SAFFEELS, entered the Piilani Village
8 shopping Center Safeway. At approximately 00:11AM, BRANDON CHARLES
9 SAFFEELS was apprehended without incident by Maui Police Officers as he was
10 leaving the Piilani Village Shopping Center Safeway. Once apprehended,
11 BRANDON CHARLES SAFFEELS was transported to the Maui Police Department
12 Kihei Station. BRANDON CHARLES SAFFEELS gave transporting officers his
13 consent to search and transport his vehicle and to search his cell phone that he had on
14 his person.

15 8. At approximately 00:45AM at the Maui Police Department Kihei Station,
16 BRANDON CHARLES SAFFEELS was interviewed by Maui Police Detective Lance
17 Yorita, FBI Special Agent Kyle Carpenter, and FBI Special Agent Adam Hartman.
18 BRANDON CHARLES SAFFEELS was advised of rights and voluntarily waived his
19 fifth amendment right in order to speak with the interviewers. During the interview,
20 BRANDON CHARLES SAFFEELS admitted to sending the undercover chatter the
21 messages from the phone number (808) 283-9024, admitted that he believed that he
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1 was speaking with a thirteen-year-old female, admitted that he requested the chatter
2 send nude photographs, admitted to sending a nude photograph of himself to what he
3 believed was a thirteen-year-old female, and admitted that he intended to have sexual
4 contact with a thirteen year old female when he entered the Piilani Village Shopping
5 Center Safeway.
6

7
8 **CONCLUSION**

9 9. Based on the foregoing, I believe that there is probable cause to arrest
10 BRANDON CHARLES SAFFEELS for the violation of federal law set forth above.
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14 Matthew Laramée
15 Special Agent
16 Homeland Security Investigations

17 Sworn to under oath before me telephonically, and attestation acknowledged
18 pursuant to Federal Rule of Criminal Procedure 4.1(b)(2) on December 6, 2021: at 4:46 p.m.





Kenneth J. Mansfield
United States Magistrate Judge